

IN THE UNITED STATES DISTRICT COURT OF EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

ROBERT D. HORN, et al
Plaintiffs

vs

Case No. 4:08 cv 01033 tia

ST LOUIS COUNTY, et al
Defendants

PLAINTIFFS' MEMORANDUM IN SUPPORT OF MOTION TO
SEVER, PERMIT WITHDRAWAL ROBERT REINHOLD AS
COUNSEL FOR ROBERT HORN AND GRANT EXTENSIONS
OF TIME TO REORGANIZE PLEADINGS

Comes now the Plaintiff, by counsel Robert Reinhold, and hereby,
in support of Motion to Sever, Permit withdrawal of Robert Reinhold as Counsel for
Robert Horn, and Grant Extensions of Time., states to wit:

1. It is concluded by the undersigned counsel Robert Reinhold, that the Second
Amendment of the U.S. Constitution may be helpful, if alleged as part of the basis of
claims of Robert Horn against defendants justifying his actions and supporting the basis
for his actions and claims against the defendants. HELLER VS. U.S. , ET AL.

2. The undersigned Counsel is opposed to Robert Horn or anyone having a RIGHT
to bear arms under any circumstances, and this conclusion of the undersigned Counsel
was arrived at in recent times because of recent national gun violence occurrences, and
thus the undersigned Counsel opposes the Second Amendment and does not desire to
promote its legal viability and promotes having it amended out of the U.S. Constitution.

3. Robert Horn believes he has a RIGHT to bear arms under the Second Amendment
and expects to have his claims fully pursued in this regard to all extents legally possible.
(See affidavit of Robert Horn attached). This difference was only discovered recently.

4. Robert Horn believes that certain events that occurred between him and Ken Cox
and Scott Cox and members of the Cox family that occurred before September 9, 2005 and

after July 15,2006 are relevant and should be presented in the case and Robert Reinhold does not agree and the difference is not reconcilable.(See affidavit of Robt Horn attached) This difference of opinion was only discovered in its intensity recently.

5. There may be some differences in certain factual recollections as time and place and total circumstances of certain events, that probably are of no consequence, between Marian Horn and Robert Horn, (see affidavits attached) but they would need not to be considered if the cases were severed.

6. The claims against Scott Cox have no relation to the claims of the Plaintiff Marian Horn and the claims of Robert Horn relating to September 9,2005 have little or no relation or relevance to the Claims of Marian Horn, and, thus such claims or defenses of such claims may prejudice the case of Marian Horn against various defendants and thus the cases should be severed.

THEREFORE, in conclusion the cases should be severed, Robert Reinhold should be withdrawn as Counsel for Robert Horn and time granted to reorganize the pleadings.

IT IS REQUESTED ISSUES HEREIN BE FILED UNDER SEAL AND NOT PRESENTED TO THE DEFENDANTS OR THEIR COUNSEL,UNLESS REQUIRED.

Respectfully submitted,

/s/ROBERT J. REINHOLD 20696
8050 Watson Rd. #101
St. Louis, Mo. 63119
842-4445 and FAX 842-0359
E-Mail: reinlaw@aol.com

SERVICE

Service this January 9,2013 on all parties as may be appropriate by electronic filing.
/s/Robert J. Reinhold

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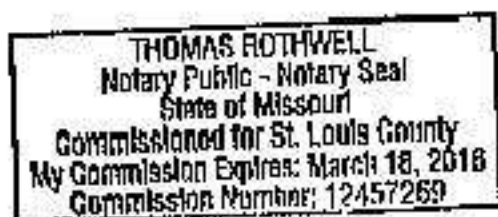
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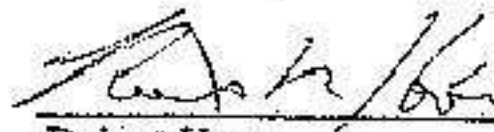
ST LOUIS COUNTY, et al
Defendants

STATE OF MISSOURI S.S. AFFIDAVIT

Comes now Robert Horn and upon his oath deposes and states:

1. He has been informed by Robert Reinhold that his court date is April 15, 2013
2. He has also been informed that Robert Reinhold has moved the Court to sever his case for trial from that of his sister Marian Horn and that it is alright with him that the cases be severed from each other.
3. He believes there are several matters that could be conflicts in presentation of his case from that of his sister, such as if he was at certain places at certain times in certain sequence on July 15, 2006 and Sept 9, 2005
4. He realizes that Robert Reinhold intends to continue as counsel on his sister's case after it is severed from his case, but that Robert Reinhold has asked to be withdrawn as counsel on his case and that is alright with him as long as other counsel can be found for the case.
5. He will participate as a witness in his sister's case if asked to do so by her counsel.
6. He realizes that Robert Reinhold has different position on whether the Second Amendment rights should be presented on his behalf and certain disagreements on whether certain events prior to Sept 9, 2005 or subsequent to July 15, 2006 should be presented in the trial of the case and such may be an irreconcilable difference in the philosophy of the issues in this litigation.




Robert Horn

NOTARY

The foregoing was read, signed and sworn to before me this 8 day
of JAN, 2013 by Robert Horn., to me known



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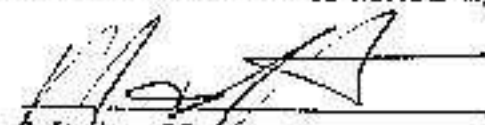
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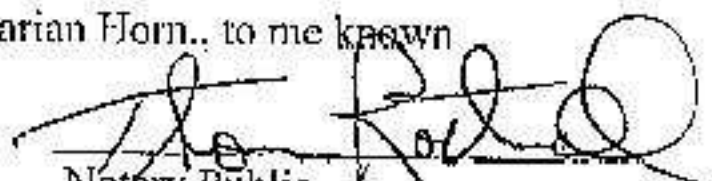
Comes now Marian Horn and upon her oath deposes and states;

1. She has been informed by Robert Reinhold that her court date is April 15, 2013
2. She has also been informed that Robert Reinhold has moved the Court to sever her case for trial from that of her brother Robert Horn and that is alright with her that the cases be severed from each other.
3. She believes there are several matters that could be conflicts in presentation of her case from that of her brother, such as: whether her brother was intoxicated on July 15, 2006 and Sept 9, 2005
4. She realizes that Robert Reinhold intends to continue as counsel on her case after it is severed from her brother's case.
5. She will participate as a witness in her brother's case if asked to do so by her brother or his counsel.


Marian Horn

NOTARY

The foregoing was read, signed and sworn to before me this 8 day
of Jan 2013 by Marian Horn, to me known


Notary Public

